



## FEMA Requirement A3: Public Involvement

### Does the Plan document how the public was involved in the planning process during the drafting stage?

Local Mitigation Plan Review Guide, FEMA, 2011, page 16

This “Good Practice” document is intended to help plan developers understand the FEMA requirement related to documenting public input and engagement while developing a local hazard mitigation plan. While public outreach takes effort, it is instrumental in creating a meaningful plan that reflects the concerns and priorities of local residents.

### Common Reasons Why FEMA Returns Plans for A3 Revisions

1. Outreach activities are inadequately documented, leaving out crucial information such as the opportunity(s) provided to the public to offer or submit comments and suggestions. For instance, public workshops or meetings held during the process, how these were advertised, and if attended and by whom. A plan may be unclear about whether written comments were requested, a contact person was identified, or a comment deadline clearly established.

**Tip:** FEMA encourages communities to go beyond the minimum legal requirements for public meeting notices. For example, directly invite specific parties, such as local boards and committees, neighborhood organizations, citizens who are or may be impacted by natural hazards, or other interested groups/individuals.

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**Tip:** Explain how citizens were informed that information is available online, such as when comments are solicited on a municipal website.

**Note:** All citizens do not have internet access, so additional methods are typically considered necessary. In addition, each state has specific requirements for legal public notices which may not include online posting of notices.

2. The plan does not state whether any input was received.

**Tip:** Acknowledge a lack of public attendance at meetings or if no one offered comments.

**Tip:** Examine the effectiveness of efforts in soliciting the public and use this information in meeting Requirement A5 by proposing improvements for future efforts.

3. A description is missing about how public input was incorporated or changed the plan. An explanation may be lacking for alterations made to risk and vulnerability assessments, plan priorities, mitigation strategies, etc.

**Tip:** Compile a summary of public comments and their sources. Explain which aspects of the plan, if any, changed as a result and why.

## Plan Demonstrating Good Practice for Requirement A3

This section provides two examples of how communities engaged the public. The first, from a multi-jurisdiction planning process, documents how comments influenced plan development. The second is a public notice that fully informs the public about how to comment.

The abstracts from the plans are preceded by a brief explanation of why each meets the requirements. Practices going “Beyond Minimum Requirements” are also noted. Many other approaches are possible, so don’t be limited by these examples; the approach taken should fit the particular circumstances of the community.

### Example 1: Greater Bridgeport Regional Council: Natural Hazard Mitigation Plan (2014)

#### Why This Plan Demonstrates Good Practice

1. The plan identifies how outreach was conducted within each community under this multi-jurisdictional plan; including the resources used by each community to communicate hazard mitigation and risk to the public and municipal staff.

**Beyond Minimum Requirements:** Diverse opportunities for involvement were provided, including a web-based survey, public information forums, and facilitated workshops. The plan demonstrates a well-developed understanding of the public diversity within the jurisdictions served by the Greater Bridgeport Regional Council.

2. Public outreach opportunities were well advertised.

**Beyond Minimum Requirements:** A variety of communication approaches (media, newsletters, posted notices, and other forms of communication) was used during the process.

**Beyond Minimum requirements:** The process clearly articulated goals for public engagement: a stated objective was to identify opportunities for the community to resolve natural hazard issues and problems.

3. The plan summarizes the kinds of comments received at public information meetings. The summary for the Easton, Monroe, and Trumbull public information meeting is included in the abstract on the following pages.
4. The plan documents how outreach comments influenced plan content on page 216.

See Abstract on following pages.

Abstract from Section 2, pages 2-28 to 2-30

***Greater Bridgeport Regional Council:  
Natural Hazard Mitigation Plan***

Continued

## **2.7 Community Outreach**

In an effort to develop a more comprehensive and publicly supported Natural Hazard Mitigation Plan, the GBRC followed a proactive public involvement process. This process included creating a page on the GBRC website, developing an online survey and holding a series of public information meetings. The web-page presented an overview of the purpose of the NHMP and summary of the plan development process.

*Screen shots of the webpage are included as Appendix B.*

### **Web-based Survey**

The web-based survey solicited public input and comments on natural hazards likely to impact the Greater Bridgeport Region. The survey was used to ascertain the public opinions on whether respondents had been impacted by a past or recent event and whether a future occurrence of the natural event was definite, likely or remotely possibility.

Respondents were asked to rank how susceptible various community “assets” were to natural hazards and extreme weather. Community assets included:

- People: loss of life and personal injury;
- Economic: business interruptions and closures and job losses;
- Infrastructure: damage and/or loss of roads, bridges, utilities and schools;
- Cultural/historic: damage and/or loss of libraries, museums and historic properties;
- Environmental: damage, contamination and/or loss of natural resources, such as, forests, wetlands, marshes and water courses; and
- Governance: loss of the ability to maintain order and/or to provide public amenities and services.

Several questions were asked about the awareness of community provided resources so as to better cope with the effects of a natural disaster and prepare for extreme weather. This included asking whether or not the respondent knew where shelters were located. The survey is attached in Appendix C.

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Abstract from Section 2, pages 2-28 to 2-30

***Greater Bridgeport Regional Council:  
Natural Hazard Mitigation Plan***

Continued

**Public Outreach**

Public participation also provided an opportunity to educate the public about natural hazards and the value of mitigation planning. In addition to the web-based approach, four public information forums were held for Bridgeport, Fairfield, Stratford and a combined event for Easton, Monroe and Trumbull.

**Advertising and Promotion**

To advertise and promote the series of public information meetings, a display advertisement was prepared and published in the Connecticut Post newspaper (CT Post). The CT Post has a wide, regional circulation and is the primary source for printed news and information in the region. The display ad was in the Friday, September 13, 2013 edition of the newspaper and was shown on page A11 in the Opinion section.

Notices of these public meetings were sent to the municipal representatives of the NHMP planning teams. Representatives were asked to post the display ad on municipal websites and place the flyer announcing the meetings at visible locations in the respective town and city halls.

Web-based advertising was also undertaken. The times, dates and locations of the public meetings were listed in a sidebar on the main GBRC News webpage and featured on the GBRC Events page. Links for more information were embedded. A brief article was included in the GBRC's newsletter as well. Social media was utilized by posting public meeting information on the GBRC Facebook page.

For each forum, a member of the GBRC staff presented on the process of updating the Regional Natural Hazard Mitigation Plan, as well as the impacts from recent events. Hazard profiles and the likelihood of events happening in the future were also discussed. The primary focus of the public meetings was to solicit information and comments from the public on how the community should address natural hazards and what actions, strategies and projects should be implemented to reduce the effects of future natural hazards. Attendees were directed to the GBRC website to access and complete the community natural hazard survey. The survey was also made available to those attending the public forums.

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***Greater Bridgeport Regional Council:  
Natural Hazard Mitigation Plan***

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**Public Information Forums**

**For Easton, Monroe and Trumbull**

Tuesday, September 17, 2013 – Town of Trumbull

The meeting was held in the Town Council Chambers, located in the Trumbull Town Hall and was targeted at residents of Easton, Monroe and Trumbull. Seven people attended and participated in the discussion (attendance list is attached in Appendix B). GBRC staff presented an overview of the purpose and need for updating the Regional Natural Hazard Mitigation Plan. At the conclusion of the presentation, the discussion focused on answering questions and addressing concerns expressed by attendees. While GBRC staff emphasized that the plan will consider all natural hazards that may impact the region, the main concern expressed by residents was recurring flooding from heavy rains, regardless if caused by a tropical storm, nor'easter or summer thunder storm. Based on FEMA flood and storm inundation maps, several areas of Trumbull are susceptible to periodic flooding. Several residents suggested actions to address recurring flooding and asked whether these projects could be included in the NHMP and thus eligible for FEMA grant funds.

Suggested actions included:

- Dredging or removing sediment from several small ponds in Twin Brooks Park that have filled in over the years. The result of this action would be an increase in storage capacity during heavy rain events. (Note: The channel had been relocated as part of the construction of the Route 25 Expressway).
- Adjusting the channel of the Pequonnock River through Twin Brooks Park to improve flow and prevent water from overflowing the banks during heavy rain events.
- Installing weirs on the Pequonnock River in the Pequonnock Valley State Wildlife Preserve north of Daniels Farm and upstream of neighborhoods susceptible to recurring flooding. The result of this action would be to regulate or control the flow of water during heavy rain events. The Pequonnock Valley area is more capable of functioning as a water retention area than the Twin Brooks Park area.

A discussion ensued on the Community Rating System (CRS) and its applicability to the Town of Trumbull. Participating in the CRS program could reduce flood insurance premium rates for town residents required to purchase coverage. As part

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***Greater Bridgeport Regional Council:  
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of this discussion, the consequences of the Biggerts-Waters Flood Insurance Reform Act of 2012 were brought up. A resident mentioned that subsidies and discounts on flood insurance premiums would be phased out under the Act and that homeowners were likely to experience sizeable increases in flood insurance rates.

**For Bridgeport**

Monday, September 23, 2013 City of Bridgeport

Several residents attended the workshop for the City of Bridgeport.

**For Fairfield**

Thursday, September 19, 2013 – Town of Fairfield

The meeting was held in the conference room of the Fairfield Board of Education (located in the BOE's office) and was targeted to residents of Fairfield. Six people attended and participated in the discussion (attendance list is attached in Appendix B). GBRC staff presented an overview of the purpose and need for updating the Regional Natural Hazard Mitigation Plan. At the conclusion of the presentation, the discussion focused on answering concerns expressed by attendees. The Town of Fairfield experienced severe flooding from Super-Storm Sandy, especially in the Fairfield Beach and shoreline areas, with several homes destroyed. Because of this recent event, residents in attendance were most focused on actions to prevent a recurrence of flood water inundation.

Attendees of the public meeting expressed similar concerns as those expressed at the workshops – such as the need to protect the wastewater treatment plant and raise the dike along Pine Creek. The Town's Code Red system and the institutional knowledge of Town Staff were highlighted as assets. Experience and knowledge gained during Superstorm Sandy will inform responders and stakeholders during future events.

Other issues identified included:

- The generator at Ludlowe did not heat the gyms.
- Checkpoints are needed to keep people out of flooded neighborhoods.

The impact of natural hazards on the Town of Fairfield varies by location. The coastal area is susceptible to coastal flooding from elevated storm surges due to tropical storms or hurricanes, while the northern part of the town is susceptible to isolation because of downed trees.

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***Greater Bridgeport Regional Council:  
Natural Hazard Mitigation Plan***

Continued

**For Stratford**

Wednesday, September 19, 2013 – Town of Stratford

The meeting was scheduled in the Birdseye Municipal Complex and was targeted to residents of Stratford. No one from the public attended the meeting.

**Contact with Adjacent Communities**

*The involvement of other communities and regions was accomplished by direct contact with the municipal staff of adjacent cities and towns. The Greater Bridgeport region is bordered by seven municipalities:*

**City of Milford**

Borders Stratford along the Housatonic River.

**Town of Newtown**

Borders Easton and Monroe. The watersheds of the Aspetuck River, Halway River and Pootatuck River overlap the town boundaries. The Housatonic River forms the eastern border of Newtown.

**Town of Oxford**

Borders Monroe along the Housatonic River.

**Town of Redding**

Borders Easton. The watersheds of the Aspetuck River and Saugatuck River overlap the town boundaries.

**City of Shelton**

Borders Monroe, Trumbull and Stratford. The watersheds of the Booth Hill Brook, Farmill River, Means Brook, and Pumpkin Ground Brook overlap the town boundaries. The Housatonic River forms the eastern border of Shelton.

**Town of Weston**

Borders Easton. The watersheds of the Aspetuck River and Saugatuck River overlap the town boundaries.

**Town of Westport**

Borders Fairfield. The watersheds of the Aspetuck River and Sasco Brook overlap the town boundaries.

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**Abstract from Section 2, pages 2-27 to 2-30*****Greater Bridgeport Regional Council:  
Natural Hazard Mitigation Plan*****Continued**

A survey, similar to the one developed for the general public, was prepared and emailed to appropriate municipal staff. These included: city/town planners, inland wetlands and watercourses officers/agents, public works directors, conservation planners, city/town engineers and emergency management directors. A copy of the survey and the list of recipients are attached as Appendix C.

In addition, Regional Planning Organizations (RPO) adjacent to the Greater Bridgeport Region were contacted and asked about their efforts to mitigate the impacts of natural hazards. Similar to the outreach efforts described above, a survey was prepared and electronically transmitted to each RPO.

The Greater Bridgeport region is bordered by:

- South Western Regional Planning Agency (SWRPA) to the west.
- Housatonic Valley Council of Elected Officials (HVCEO) to the northwest.
- Council of Governments of the Central Naugatuck Valley (COGCNV) to the northeast.
- Valley Council of Governments (VCOG) to the northeast.
- South Central Region Council of Governments (SCRCOG) to the east.

The survey sent to the RPOs is attached in Appendix C.

**Example 2: Single-Jurisdiction Natural Hazard Mitigation Plan****Why This Plan Demonstrates Good Practice**

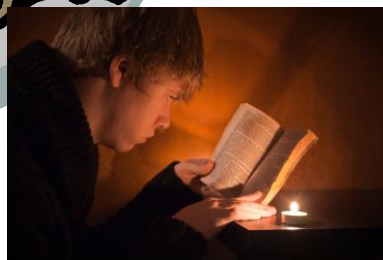
1. The public notice fully explains where to obtain a plan copy, how to submit comments (to whom and by what means), and the date when comments must be received. It stresses mitigation, instead of preparedness.  
**Beyond Minimum Requirements:** The notice provides information about the plan so readers can determine whether they are interested in reading and possibly commenting.
2. The notice identifies both electronic and paper methods of communication, recognizing that not everyone uses email or may be able to access the plan online.

See example on following page.

# Will our community be able to withstand damages from the next ice storm? Flood event? Extended power outage?



would like to know  
you have suggestions or  
local knowledge is



The (Name of Town/City/Tribe) is developing a Hazard Mitigation Plan to reduce vulnerabilities from potential future hazards in our community.

As the Town/City/Tribe is taking action to make our people, buildings, and infrastructure more resilient, won't you join us? Your input is important! **We your opinions.** Let us know if comments about the plan. Your critical to making the plan effective.

## Hazard Mitigation Goals

- Reduce the loss of life and injury resulting from all hazards.
- Reduce the impact of hazards on the town's water bodies, natural resources, and historic resources.
- Reduce the economic impacts from hazard events.
  - Minimize disruption to the road network and maintain access,
  - Mitigate financial losses incurred by municipal, residential, industrial, agricultural and commercial establishments due to disasters,
  - Ensure that community infrastructure is not significantly damaged by a hazard event.
- **Ensure that members of the general public continue to be part of the hazard mitigation planning process.**

The Draft Plan is available for review at the following locations:

- City/Town/Tribal Office & Library – Hard Copy available
- City/Town/Tribal website: XXXXX@XXXXX



**Please review sections of the plan that interest you and return comments by March 10, 2016 to:**

- Name, City/Town/Tribal Clerk, postal and email addresses
- Name, Regional Planning Commission (if appropriate),  
postal/email addresses, tel. #



Note: Adapted from a notice developed by  
Windham Regional Commission, VT

## A3 Regulatory Guidance

### Abstracts from *Code of Federal Regulations and Local Mitigation Plan Review Guide, October 1, 2011*

#### Element A3 Regulation [§201.6(b) (1) and §201.6(c) (1)] (page 14)

An open public involvement process is essential to the development of an effective plan. In order to develop a more comprehensive approach to reducing the effects of natural disasters, the planning process shall include:

(1) an opportunity for the public to comment on the plan during the drafting stage and prior to plan approval.

[The plan shall document] the planning process used to develop the plan, including how it was prepared, who was involved in the process, and how the public was involved.

#### Element Intent (page 16)

To ensure citizens understand what the community is doing on their behalf, and to provide a chance for input on community vulnerabilities and mitigation activities that will inform the plan's content. Public involvement is also an opportunity to educate the public about hazards and risks in the community, types of activities to mitigate those risks, and how these impact them.

#### Element Requirements (page 16)

- a. The plan **must** document how the public was given the opportunity to be involved in the planning process and how their feedback was incorporated into the plan. Examples include, but are not limited to, sign-in sheets from open meetings, interactive websites with drafts for public review and comment, questionnaires or surveys, or booths at popular community events.
- b. The opportunity for participation **must** occur during the plan development, which is prior to the comment period on the final plan and prior to the plan approval / adoption.

## Check Out These Additional Aids

Local Mitigation Plan Review Guide, October 2011

<http://www.fema.gov/media-library/assets/documents/23194>

Local Mitigation Planning Handbook, March 2013 (pages 3-3 through 3-7)

<http://www.fema.gov/media-library/assets/documents/31598>